

**CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B., D.P.,  
A.F., C.A., R.K., K.P., and T.H.,

Plaintiffs,

v.

RED ROOF INNS, INC., FMW RRI  
NC, LLC, RED ROOF  
FRANCHISING, LLC, RRI WEST  
MANAGEMENT, LLC, VARAHI  
HOTEL, LLC, WESTMONT  
HOSPITALITY GROUP, INC., and  
RRI III, LLC,

Defendants.

**PL Sum. J.**

**Ex. 075**

CIVIL ACTION FILE

NO. 1:20-cv-5263-MHC

JURY TRIAL DEMANDED

Pursuant to Fed. R. Civ. P. 38

**PLAINTIFF E.H.'S AMENDED AND SUPPLEMENTAL  
OBJECTIONS AND RESPONSES TO  
DEFENDANT RED ROOF INNS, INC.'S FIRST INTERROGATORIES**

Plaintiff E.H. (“E.H.” or “Plaintiff”) hereby provides these amended and supplemental objections and responses to Defendant Red Roof Inns, Inc.’s First Interrogatories (the “Interrogatories”). Plaintiff incorporates by reference her objections to these Interrogatories, including objections to definitions and instructions, which she served on August 30, 2021. And specifically, Plaintiff states that, to the extent she provides identifying information of Victims of Sex Trafficking, she does so only subject to the

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Although E.H. does not recall the exact dates of each of her visits, she is confident she was at this hotel on the following dates:

- 09/12/2017
- 05/31/2018
- 08/22/2018
- 08/25/2018
- 08/26/2018
- 09/02/2018
- 09/07/2018
- 08/30/2018

E.H. recalls that police came to this hotel at some point and arrested four women and two men. At that time, Mr. [REDACTED] moved E.H. to a room in the back of the building to avoid being noticed by the police and so they could see better who was coming and going from the hotel.

E.H. also interacted with hotel employees at this hotel and is confident that employees knew about sex trafficking occurring at the hotel. She remembers one worker, a middle-aged Indian man who claimed to be the husband of the owner of the hotel. He would pay E.H. for sex sometimes twice per week, paying \$300 per visit. And if there were police activity in the area, this worker would call E.H. and warn her about it so she and her trafficker would not get caught. He would see E.H. consistently for about two years during her trafficking.

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**VERIFICATION**

The answers set forth in **PLAINTIFF E.H.'s AMENDED AND SUPPLEMENTAL OBJECTIONS AND RESPONSES TO DEFENDANT RED ROOF INNS, INC.'S FIRST INTERROGATORIES** are true and correct to the best of my knowledge, information and belief based on the information currently available to me. I reserve the right to make changes to these Objections and Responses if it appears that an error or omission has been made therein or if more information becomes available.

I hereby verify, pursuant to 28 U.S.C. § 1746 and subject to penalty of perjury that the factual information contained in the foregoing responses to

interrogatories is true and correct to the best of my knowledge, information and belief.

This 8/8/2022 day of August 2022.

DocuSigned by:  
  
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E.H.